



March 27, 2017

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, S.W.
Washington, D.C. 20554

Re: NOTICE OF EX PARTE
WC Docket No. 16-106: *Protecting the Privacy of Consumers of Broadband and Other Telecommunications Services*

Dear Ms. Dortch,

On March 24, 2017, Mike Lazarus, Managing Member, Telecommunications Law Professionals and I, representing Competitive Carriers Association (“CCA”),¹ met with Amy Bender, Legal Advisor to Commissioner O’Rielly, Wireline.

During the meeting, CCA discussed its Petition for Reconsideration² of the 2016 Privacy Order,³ and reiterated its concern that the Federal Communication Commission’s (“FCC” or “Commission”) privacy rules create an unwarranted regulatory disparity between broadband and edge providers that will harm competition and consumers. CCA also stressed how the 2016 Privacy Order applies undue burdens to small providers, and discussed small provider issues as detailed by CCA in its reply to oppositions to CCA’s Petition for Reconsideration.⁴ Relatedly, CCA discussed ongoing Congressional activity regarding privacy, including actions taken pursuant to the Congressional Review Act.

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

² See Petition of the Competitive Carriers Association for Reconsideration, WC Docket No. 16-106 (filed Jan. 3, 2017).

³ *Protecting the Privacy of Customers of Broadband and Other Telecommunications Services*, Report and Order, FCC 16-148 (rel. Nov. 2, 2016) (“2016 Privacy Order”).

⁴ See Competitive Carriers Association Reply to Oppositions to Petition for Reconsideration, WC Docket No. 16-106 (filed March 16, 2017).

CCA commended Commissioner O’Rielly’s recent blog post stressing the need to reign in FCC-imposed information collection burdens, track associated cost data, and analyze that data to eliminate duplicative or unnecessary paperwork burdens.⁵ CCA agrees that tracking cost and time burdens is important, especially to ensure small providers are not overburdened.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission’s Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

/s/ *Elizabeth Barket*

Elizabeth Barket
Law & Regulatory Counsel
Competitive Carriers Association

cc (via email): Amy Bender

⁵ Commissioner Michael O’Rielly, *Taking Stock of FCC Paperwork Burdens*, FCC Blog (March 3, 2017), <https://www.fcc.gov/news-events/blog/2017/03/03/taking-stock-fcc-paperwork-burdens>.